

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

VERMONT MUTUAL INSURANCE COMPANY)	CIVIL ACTION
as subrogee of TIMOTHY D. STEIN and)	
WAYNE ROLF,)	NO. 05-10307 JLT
Plaintiff,)	
)	
v.)	
)	AFFIRMATION OF
DAVID'S FLOOR SERVICE, INC.,)	PATRICK J. LOFTUS, III,
and)	ESQUIRE
)	
MIN DANG, d/b/a)	
DAVID'S FLOOR SERVICE,)	JURY TRIAL DEMANDED
)	
Defendants.)	

NOW COMES Patrick J. Loftus, III, Esquire, counsel for Plaintiff, and respectfully moves this Court to enter an Order, in the form attached, for the admission *Pro Hac Vice* of James P. Cullen, Jr., Esquire and Joseph F. Rich, Esquire, to appear herein as counsel for Plaintiff.

In support of this motion, Movant states as follows:

1. I am an attorney duly licensed to practice law in the Commonwealth of Massachusetts and represent Plaintiff in this matter.
2. I have been acting as local counsel for Plaintiff with respect to this matter.
3. As counsel for Plaintiff, I have cooperated with Mr. Cullen and Mr. Rich, who have also prepared the case and are also ready to proceed with discovery and trial, such that granting this motion will not delay the preparation or trial of this case.
4. I know Mr. Cullen and Mr. Rich to be qualified attorneys with experience in the area of fire and property damage litigation, such issue being presented in the instant lawsuit, and to be members in good standing of the Bar of the Commonwealth of Pennsylvania.

5. The Commonwealth of Pennsylvania grants *Pro Hac Vice* admission to duly licensed attorneys from the Commonwealth of Massachusetts.

6. In further support of its motion, Movant incorporates, by reference, the annexed Affidavit of James P. Cullen, Jr., Esquire, [See Exhibit "A"] and the annexed Affidavit of Joseph F. Rich, Esquire. [See Exhibit "B"].

WHEREFORE, Movant respectfully requests that the Court grant an Order allowing the admission *Pro Hac Vice* of James P. Cullen, Jr., Esquire and Joseph F. Rich, Esquire to practice with respect to the above entitled action.

Respectfully submitted,

BY: 

Patrick J. Loftus, III, Esquire

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Attorney for Plaintiff